PM 0052

Western Wildlife Conservancy

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May 6, 2016

Sally Jewell
Secretary, Department of Interior
1849 C. Street,
Washington, DC 20240

Dear Secretary Jewell,

On behalf of the supporters of Western Wildlife Conservancy and millions of Americans, I urge you to disallow the delisting of the Grizzly Bear in the greater Yellowstone ecoregion.

This is not just about science; it's also about values. And arguably the values that ought to prevail are being largely ignored.

Millions of American citizens, including 41 Native American tribes, do not want the grizzly delisted and its fate as a species and an ecosystem-shaping force subjected to the political machinations of the states of Idaho, Montana and Wyoming. The latter two are already making plans for grizzly hunting. This will have the effect of confining the bears to an arbitrarily small area for no other reason than to serve a few special interests, e.g., trophy hunters, guides, outfitters, taxidermists, etc., and livestock ranchers.

The Endangered Species Act is premised on the proposition that wild species and their habitats have an intrinsic value that cannot be quantified in monetary terms and that this value is sufficient reason for protecting them. This is implied by the language of the Act, which includes this statement at the outset:

> "Sec. 2(b) PURPOSES. – **The purposes of this Act are to provide a means whereby the ecosystems upon which endangered species and threatened species depend may be conserved, to provide a program for the conservation of such endangered species and threatened species,** and to take such steps as may be appropriate to achieve the purposes of the treaties and conventions set forth in subsection (a) of this section." (my emphasis)

The only sensible rationale for this statement is that wild species and their habitat have intrinsic value and that this value deserves respect. And intrinsic value, by its very nature,

cannot be reduced to monetary value. So what good reason has FWS for moving to delist the Yellowstone grizzly?

It is unsatisfactory to simply say that agency scientists think delisting is justified under the Act; rather, the agency ought to tell us why delisting is justified given the intrinsic value of the species and the interests of the vast majority of American citizens, including 41 tribes of Native Americans, not to mention the good of myriad creatures that grizzlies benefit directly and indirectly. How is it that the interests of vociferous local ranchers and trophy hunters can trump all these other interests which so vastly outnumber them, including, as well, the economic benefits that ecotourism provides to Yellowstone gateway towns?

Granted, the population of Yellowstone grizzlies has significantly increased over the last 40 years or so, thanks largely to protection under the Endangered Species Act. Let's not let it slide back to the brink. Even though the population has rebounded and wolves are providing nutritious carrion for the bear, other important food sources have drastically declined: cutthroat trout, whitebark pine nuts, army cutworm moths, plus reduced ungulate populations. This does not bode well for the future of Yellowstone grizzlies, especially given that grizzlies are the slowest reproducing mammal in North America – and most especially if trophy hunting is added!

The Yellowstone grizzly population remains physically and genetically isolated from other northern Rockies populations and, if delisted, will be constantly culled by trophy hunters, effectively eliminating any possibility of it expanding its range to additional suitable former habit. This can't be a good thing for the grizzly or for those of us who value them as living creatures. Please don't let it happen.

Respectfully,

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Cc: Dan Ashe, Director of the U.S. Fish and Wildlife Service